**Former Pechiney Cast Plate Facility**
**Completion Report Questions/Comments**
**August 28, 2015**

**Completion Report / Figures Comments:**

1. ProUCL data supports conclusion that cleanup goals are met on a site-wide basis.
2. Based on review of the figures, the following areas appear to be missing sidewall confirmation samples for PCB excavations. For each excavation location, please provide either an explanation of why sidewall confirmation samples are not necessary, or a plan to take the samples.

| Phase Area | Grid Area | Comment |
|---|---|---|
| I | 111, 133 | Only one sidewall sample visible around Soil removal area 13 |
| I | 136 | Only one sidewall sample visible around 87-SS-010 |
| II | 308 | No confirmation samples taken around Soil removal area 15 |
| II | 274, 275 | Rectangular excavation straddling grid 274-275 has no samples |
| II | 245 | No sidewall samples taken around sample #1334 excavation |
| II | 275, 290, 305 | No eastern side wall samples on excavations in these grid areas |
| III, IV, or VI | 532 | No sidewall samples visible around 801-SS-002 |

**Soil Management Plan Comments:**

1. 4.0 Soil Management. Consider reiterating that all depths are measured with respect to native grade.
2. 4.1.2 Fugitive Dust. Estimate maximum dust emissions threshold – more information to follow.
3. 4.2 Soil Testing and Equipment Decontamination.
    a. PCBs, in addition to TPH and VOCs, are a contaminant of concern. If additional soil sampling is conducted, it must occur in place for determining disposal requirements (if necessary).
    b. Description of EPA test method for PCBs should also allude to extraction method 3540C (also add this in the second to last bullet of 4.3, and the third bullet of 4.5).
    c. When soils are found to contain PCBs, re-usable equipment must be decontaminated in accordance with the procedures in 40 CFR 761.79; decontamination waste must also be handled in accordance with that section.
4. 4.3 Stockpile Management and Testing.
    a. All soils found to contain PCBs at 50 ppm or higher must be stored in accordance with the requirements in 40 CFR 761.65. In addition to plastic sheeting covers, stockpiles should be managed to minimize migration of contaminated soils. Some best practices may include proper sloping to prevent run-on and infiltration of stormwater, appropriate compaction to maintain pile integrity, and adequate security to deter trespassers.
    b. In determining the concentration of soil for purposes of disposal, soil PCB samples must be taken in the ground prior to excavation (not in the stockpiles). This may not be clear to external readers as currently worded
5. 4.5 Import Fill Soil Requirements. PCBs in the imported soil should be <1ppm total PCBs.

This review is based on the following documents submitted by Amec Foster Wheeler on behalf of the Former Pechiney Cast Plate, Inc. Facility at 3200 Fruitland Avenue, Vernon, CA 90058.

**Completion Reports:**
June 6, 2014 (Revised November 13, 2014) – Final Phase I Completion Report
September 26, 2014 – Phase V Completion Report
October 7, 2014 – Phase III, IV, and VI Completion Report
November 7, 2014 – Phase II Completion Report

**Supplemental Information:**
March 30, 2015 – Table with Summary of responses to USEPA's Conditional Approvals and Completion Reports Information
April 29, 2015 – Site Record Plan with Remaining PCB Concentrations
April 2015 – Record Grading Plan
June 26, 2015 – Data table and ProUCL Analyses
July 3, 2015 – Figures for Phases I and V
July 17, 2015 – Figures for Phases III, IV, and VI
August 14, 2015 – Figures for Phase II

**Soil Management Plan:**
February 24, 2015 – Soil Management Plan